

G. TODD WITHY (5975)
 LAW OFFICES OF G. TODD WITHY
 888 Mililani St., #700
 Honolulu, HI, 96813
 TEL.: (808) 521-2500
 FAX: (808) 536-4474
withylawcourt@aol.com

MOISES A. AVILES (226569)
 AVILES & ASSOCIATES
 560 N. Arrowhead Av., #2A
 San Bernardino, CA., 92404
 TEL.: (909) 383-2333
 FAX: (909) 383-9550
maviles1231@aol.com

Attorneys for Plaintiff
 CHRISTOPHER GAHR

**UNITED STATES DISTRICT COURT,
 DISTRICT OF HAWAI'I.**

LUCAS BRUNO III, CHRISTOPHER
 GAHR, FRANK ROBERT PAULSON,
 CHARLES TURNER, TOM YOUNG,

CIVIL NO. 03-00567-JM:BMK
 AMENDED EXHIBIT LIST.

Plaintiffs,

v.

MICHAEL CHERTOFF, Secretary,
 DEPARTMENT OF HOMELAND
 SECURITY,

Defendant.

#	Exhibit	Notes
100	Memorandum from Filbert Carvalho to Lowery Leong, RE: MSF Supervisor Gahr Oct 17, 2002	
101	Patrick Collins Counseling Form Dated Oct 18, 2002	
102	Patrick Collins Counseling Form Dated Oct 19, 2002	
103	Patrick Collins Counseling Form Dated Oct 20, 2002	
104	Patty Igarashi Counseling form	

	Dated October 20, 2002	
105	E-Mail from Gahr to Filbert Carvalho Dated October 20	
106	E-Mail from Gahr to Filbert Carvalho Dated October 20	
107	Letter from Carvalho to Lisa Baker Dated October 21, 2002	
108	Memorandum from Howard Tagamori to Lisa Baker regarding termination / concurrence Dated October 25	Non existant
109	Letter from Howard Tagamori to Lisa Baker regarding termination Dated October 25	Non existant
110	Plaintiff Gahr's Answers to Defendants Interrogatories	
111	Affidavit of Gahr Dated July 15, 2003, Exhibit to Report of Investigation by DHS investigation of Complaint of Christopher Gahr, Complaint No. 7-03-6032	
112	Appendix to Affidavit of Gahr Dated July 15, 2003, Exhibit to Report of Investigation by DHS investigation of Complaint of Christopher Gahr, Complaint No. 7-03-6032	
113	Workplace Profile of Kahalui Airport	
114	Christopher Gahr Application for Classified Employment, San Bernardino County School District, from <u>Gahr v San Bernardino</u> <u>City Joint Unified School District</u> , California Superior Court, San Bernardino County, Case no. SCV 33196	Motion in Limini
115	Deposition of Christopher Gahr in <u>Gahr v San Bernardino City</u> <u>Joint Unified School District</u> , California Superior Court, San Bernardino County, Case no. SCV 33196	Motion in Limini
116	Declaration of Christopher Gahr in <u>Gahr v San Bernardino City</u> <u>Joint Unified School District</u> , California Superior Court, San Bernardino County, Case no. SCV 33196	Motion in Limini
117	Documents as necessary for rebuttal or impeachment	
201	Sworn Affidavit of Christopher Gahr (<u>Appendix</u>) Dated August 14, 2003 <u>Aug 12</u>	
202	Sworn Affidavit of Jason Thomas Dated July 30, 2003	
203	Sworn affidavit of Thomas Young Dated August 8, 2003	
204	Sworn Affidavit of Katherine Walker Dated August 9, 2003	
205	Sworn Affidavit of Karin Pahneuf Dated August 4, 2003	
206	Sworn Affidavit of Mike Ferril	

	Dated August 7, 2003	
207	Sworn Affidavit of Charles Turner Dated August 18, 2003	
208	Sworn Affidavit of Heather Boyum	
209	Sworn Affidavit of Patti Igarashi Dated August 18, 2003	
210	Sworn Affidavit of Filbert Carvalho Dated August 19, 2003	
211	Sworn Affidavit of Howard Tagamori Dated August 18, 2003	
212	Sworn Affidavit of Lowrey Leong Dated August 26, 2003	
213	Memorandum to Gahr from Howard Tagamori Dated October 25, 2002	
214	Sworn statement by Liz Masuda August 23, 2003	
215	Motorola T-5100-2 Photo	
216	Letter to Department of Civil Rights from Lucas Bruno Dated March 14, 2003	
217	E-mail from Theresa Greenisen Dated December 5, 2002	
218	HRM letter 752-1 Interim Policy for Addressing Performance and Conduct Problems Dated July 29, 2002	
219	Fox News Video featuring Gahr Dated October 2003	
220	E-Mail with "transmission confirmation" to Doris Thurmond Dated Feb 21, 2003	
221	E-Mail with "transmission confirmation" to Doris Thurmond Dated April 15, 2003	
222	E-Mail with "transmission confirmation" to Marino Berriero Dated May 14, 2003	
223	E-Mail with "transmission confirmation" to Stephanie Rubin Dated May 14, 2003	
224	Letter indicating new US Government Credit replacing lost or	

	stolen, US Government Credit Card, April 24, 2003	
225	W2 form mailed in 2004 for Gahr as employed of TSA in 2003	
227	Letter of Termination Of Beverly Jenkins Dated May 12, 2003	
228	Letter of Discharge and Letter of counseling Of Eddie Kaupie Dated June 2, 2003	
229	Defendants Response to Plaintiffs 3 rd Request for Production of Documents, #1 and #2	
230	Personnel file of Screening Manager Patti Igarashi	
231	Untitled book of documents – items numbered #8 thru #57 – which include: TSA Orientation, # 8 FERS, # 9 Retirement information, #10- # 22 EEOC documents for Lucas Bruno, # 23 - # 28 EEOC Documents for Christopher Gahr # 29 - # 42 EEOC Documents for Charles Turner #43 - # 54 EEOC Documents for Thomas Young # 55 Letter and Affidavit of Karen Phaneuf # 56 HRM lettr 735-2 # 57 Interim Policy on Employee Responsibilities and Conduct	
232	Federal Defendant's Responses to Plaintiff's 1st Request for Production of Documents	
233	Deposition of Lucas Bruno Dated Feb 09 2003	
234	Deposition of Charles Turner Dated Feb 08, 2003	
235	Deposition of Thomas Young Dated March 15, 2003	
236	Deposition of Filbert Carvalho Dated May 12, 2006	
237	Deposition of Pattie Igarashi Dated June 20, 2006	
238	Deposition of Patrick Collins Dated may 12, 2006	
239	Gahr's Supervisor Prototype Course Book	Issued by TSA
240	Gahr's Transportation Security Screener Training Book	Issued by TSA

241	AMA-700 Standard Operating Procedures (SOP) For TSA Screeners Dated April 3, 2002	Issued by TSA
242	Documents as necessary for rebuttal or impeachment	
243	Gahr's letter in response to Rochelle Granat's attempt to threaten Gahr by citing 18 USC section 701, regarding website TSA screener.com Dated February 13, 2003	
244	Letter by Karin Phaneuf documenting bizarre behavior by TSA management in March 2003, Dated April 10, 2003	
245	Documents showing TSA took money from Gahr's tax returns Dated 2006 to 2007	
246	Gahr's TSA Contract	

CERTIFICATE OF SERVICE.

I HEREBY CERTIFY that, on the date and by method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served by First Class mail and E-mail & Fax
Thomas A Helper 5676
Assistant U. S. Attorney
Room 6-100 PJKK federal Building
300 Ala Moana Blvd
Honolulu Hawai'i 96850-6100
tom.helper@usdoj.gov Fax (808) 941-3752

March ²⁷26, 2007 at San Bernardino, California

Henry S. Ponayak,